

## REMARKS

Claims 1-5 and 8 remain pending in the present application. The Applicants respectfully request reexamination of the present application in view of the following comments.

### 35 U.S.C. § 102

Claims 1-5 and 8 stand rejected under 35 USC § 102(b) as being allegedly unpatentable over Williams et al. (US 5,726,477, "Williams"). Applicants have reviewed the cited reference and respectfully assert that embodiments in accordance with the present invention as recited in Claims 1-5 and 8 are patentable over Williams.

With respect to Claim 1, Applicants respectfully assert that Williams fails to teach or fairly suggest "a tile" as recited by Claim 1. While Williams may teach a process for semiconductor formation, Williams is silent as to the recited tile or similar terms. Applicants respectfully assert that Williams is directed to the formation of a semiconductor, e.g., a semiconductor manufacturing process. In contrast, embodiments of the present invention as recited in Claim 1 are directed to "generating" patterns or "layout" for an integrated circuit design that may guide the manufacturing process.

While Williams may imply that a semiconductor structure was designed, Applicants respectfully assert that Williams is completely silent as to a method of producing such a design. Consequently, Williams is absolutely silent as to the recited “tile” as recited by Claim 1.

For this reason, Applicants respectfully assert that Claim 1 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

Further with respect to Claim 1, as Williams is silent as to the recited “tile,” Williams cannot and does not teach or fairly suggest the further limitations of “a tile comprising a first layer wherein said first layer comprises a first layer element for a deep N-well pattern” or “arranging multiple instances of said tile” or “a tile array” or “merging said tiles” as recited by Claim 1.

For these further reasons, Applicants respectfully assert that Claim 1 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

Applicants respectfully assert that Claims 2-5 and 8 overcome the rejections of record by virtue of their dependency, and respectfully solicit allowance of these Claims.

In addition with respect to Claim 5, Applicants respectfully assert that Williams fails to teach or fairly suggest "editing" as recited by Claim 5. Applicants respectfully assert that Williams is completely silent as to any editing.

For this additional reason, Applicants respectfully assert that Claim 5 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

## CONCLUSION

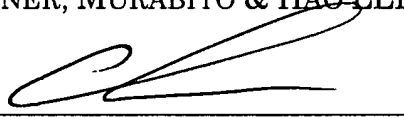
Claims 1-5 and 8 remain pending in the present application. The Applicants respectfully request reexamination of the present application in view of the remarks presented herein.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

WAGNER, MURABITO & HAO LLP

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Anthony C. Murabito  
Reg. No. 35,295

Two North Market Street  
Third Floor  
San Jose, California 95113  
(408) 938-9060